

EXHIBIT 33

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster

County of Cuyahoga v. Purdue  
Pharma L.P., et al.

City of Cleveland, Ohio v. Purdue  
Pharma L.P., et al.

The County of Summit, Ohio, et al.  
v. Purdue Pharma L.P., et al.

Case No. 1:18-OP-45132

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Deposition of
SCOTT MORAN

December 20, 2018

9:00 a.m.

Taken at:

Zashin & Rich
950 Main Avenue, Fourth Floor
Cleveland, Ohio

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THE FOLLOWING PAGES WERE DEEMED
HIGHLY CONFIDENTIAL: 128-170

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TRANSCRIPT INDEX

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES	2
INDEX OF EXHIBITS	6
INDEX OF OBJECTIONS	8
EXAMINATION OF SCOTT MORAN:	
BY MR. ROMAN	11
BY MR. BREWER	226
BY MR. GOLDSTEIN	245
AFTERNOON SESSION	144
REPORTER'S CERTIFICATE	280
EXHIBIT CUSTODY - RETAINED BY COURT REPORTER	

1 What was the question, was the
2 warrant signed?

3 Q. Yes.

4 A. To the best of my recollection, I
5 believe the warrant was signed.

6 Q. And this was in December of 2005,
7 correct?

8 A. Yes.

9 Q. In your affidavit you indicate
10 that -- this is the first page -- that you
11 believe that the person possessed OxyContin
12 pills.

13 Do you see that?

14 A. I do.

15 Q. And that's on the basis of a
16 purchase of OxyContin from that person by an
17 informant, correct?

18 A. That is correct.

19 Q. Do you recall any of the specifics
20 of this case?

21 A. No.

22 Q. Were you aware of the abuse of
23 OxyContin pills as of December of 2005?

24 MS. DEBROSSE ZIMMERMAN: Object to
25 form.

1 A. I was aware of a person selling
2 OxyContin pills in 2005.

3 Q. And that was a problem for you?

4 MS. DEBROSSE ZIMMERMAN: Object to
5 form.

6 Q. Strike that.

7 Did you believe that that was a
8 crime?

9 A. Yes.

10 Q. And you believed it was a crime
11 worth pursuing, correct?

12 A. I'm a narcotics detective, sir. If
13 I have an opportunity to investigate in a drug
14 crime, that's what I do.

15 Q. And so you viewed the sale of
16 prescription OxyContin as a drug crime, correct?

17 A. Drug trafficking, yes, sir.

18 Q. Okay. When did you first become
19 aware of trafficking of OxyContin pills?

20 MS. DEBROSSE ZIMMERMAN: Object to
21 form.

22 A. In this specific case or --

23 Q. No. In general.

24 A. I don't know.

25 Q. Certainly as of December of 2005,

1 correct?

2 A. Yes.

3 Q. How much before that?

4 A. I don't know.

5 Q. Do you recall whether you took steps
6 to investigate the source of the OxyContin that
7 was being sold in this warrant?

8 A. Sir, to be perfectly honest with
9 you, this was 13 years ago. Without more
10 specifics, I could not even tell you if this
11 search warrant was executed.

12 - - - - -

13 (Thereupon, Moran Deposition Exhibit
14 12, Search Warrant Beginning Bates
15 Number CLEVE_002250680, was marked
16 for purposes of identification.)

17 - - - - -

18 Q. Mr. Moran, I'm handing you what has
19 been marked as Moran Exhibit 12. It's a
20 multi-page document bearing production numbers
21 CLEVE 2250680 through 87.

22 Have you seen this document before?

23 A. I have. I typed it.

24 Q. This is another unsigned search
25 warrant and affidavit, correct?